

**UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT OF WISCONSIN**

LAURA ANNE RAPP, Former Personal
Representative of the Laurence A. Berg Estate,

Plaintiff,

Case No. 17-cv-00948-bbc

v.

ANDREW J. LAUFERS, KATHERINE BROWN HOLMEN,
DUDLEY AND SMITH, PA, and JOHN DOES 1 – 5,

Defendants.

MOTION FOR SUMMARY JUDGMENT

TO: ALL COUNSEL AND PARTIES OF RECORD

PLEASE TAKE NOTICE that Defendants, Andrew J. Laufers, Katherine Brown Holmen, and Dudley and Smith, PA, by their attorneys, Bell, Moore & Richter, S.C., move the Court pursuant to Fed. R. Civ. P. 56 for Summary Judgment dismissing all claims of Plaintiff, Laura Anne Rapp, Former Personal Representative of the Laurence A. Berg Estate, with prejudice.

The grounds for this Motion are as set forth in the accompanying Brief and Affidavits that there is no genuine issue as to any material fact, and that Movants are entitled to a judgment as a matter of law. This Motion is based upon all of the files and pleadings in this matter, including the Brief, Proposed Findings of Fact, and Affidavits filed herewith.

Dated this 26th day of November, 2018.

BELL, MOORE & RICHTER, S.C.
Attorneys for Defendants, Andrew J.
Laufers, Katherine Brown Holmen, and
Dudley and Smith, PA

/s/ *Sheila M. Sullivan*

By: _____
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